

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors. ¹	PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)
In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO SALES TAX FINANCING CORPORATION, Debtor.	PROMESA Title III Case No. 17 BK 3284-LTS

**INFORMATIVE MOTION IN COMPLIANCE WITH COURT ORDER
AS PER DOCKET NO. 5312 AND
TO INFORM APPEARANCE ON HEARING FOR
CREDIT UNIONS WHO ARE CREDITORS IN THIS CASE**

To the Honorable United States District Court Judge Laura Taylor Swain

COME NOW, Cooperativa de Ahorro y Crédito de Rincón, Cooperativa de Ahorro y Crédito Dr. Manuel Zeno Gandía, Cooperativa de Ahorro y Credito del Valenciano and Cooperativa de Ahorro y Crédito de Juana Díaz (hereafter referred to as (“Credit Unions”), by and through the undersigned counsel, who hereby files this informative motion in compliance with this Court’s Order Regarding Procedures for Attendance, Participation and Observation of the March 13, 2019 Hearing (“Scheduling Order”) [Docket 5312 in

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

Case no. 17-3283] respectfully state as follows:

1. The undersigned counselors inform that Wigberto Lugo Mender, Esq. or Alexis A. Betancourt Vincenty, Esq. will appear in person on behalf of the “Credit Unions” at the hearing scheduled for March 13-14, 2019 at 9:30 a.m. (Atlantic Standard Time) in the Courtroom to be determined at the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 to address, as necessary, the following matters:

Regarding Cooperativa de Ahorro y Credito de Rincon:

- a. *Cooperativa de Ahorro y Credito de Rincon* Proof of Claim Number 41478 filed on May 25, 2018;
- b. Debtor's Individual Objection to Claims Notice of Hearing for *Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito de Rincon* (Claim No. 41478) filed by PUERTO RICO SALES TAX FINANCING CORPORATION (COFINA), The Financial Oversight and Management Board for Puerto Rico, as Representative of the Commonwealth of Puerto Rico, et al. [Docket 4520 in Case no. 17-3283]
- c. *Cooperativa de Ahorro y Credito de Rincon* Response to Debtor's Objection to Claim Number(s): 41478) filed on February 25, 2019 [Docket 5220 in Case no. 17-3283].
- d. *Cooperativa de Ahorro y Credito de Rincon* Amended Proof of Claim identified with Prime Clerk Register Claim Number 168179.
- e. Debtor's Reply to Objection to Claims Re: [4520](#) Debtor's Individual Objection to Claims Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito de Rincon (Claim No. 41478). filed On March 6, 2019 by PUERTO RICO SALES TAX

FINANCING CORPORATION. [Docket 5385 in Case no. 17-3283].

Regarding Cooperativa de Ahorro y Credito Dr. Manuel Zeno Gandia

- a. *Cooperativa de Ahorro y Credito Dr. Manuel Zeno Gandia* Proof of Claim Number 44322 filed May 25, 2018;
- b. Debtor's Individual Objection to Claims *Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito Dr. Manuel Zeno Gandia* (Claim No. 44322) filed by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 4521 in Case no. 17-3283];
- c. *Cooperativa de Ahorro y Credito Dr. Manuel Zeno Gandia* Response to Debtor's Objection to Claims (Number(s): 44322) filed on February 25, 2019 [Docket 5222 in Case no. 17-3283].
- d. *Cooperativa de Ahorro y Credito Dr. Manuel Zeno Gandia* filed an Amended Proof of Claim and is identified at Prime Clerk Register Claim Number 168189.
- e. Debtor's Reply to Objection to Claims Re: [4521](#) Debtor's Individual Objection to Claims Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito Dr. Manuel Zeno Gandia (Claim No. 44322) filed on March 6, 2019 by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 5384 in Case no. 17-3283].

Regarding Cooperativa de Ahorro y Credito de Juana Diaz

- a. *Cooperativa de Ahorro y Credito de Juana Diaz* filed Proof of Claim Number 45705 filed on May 25, 2018;
- b. Debtor's Individual Objection to Claims *Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito de Juana Diaz* filed on June 11, 2019 by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 5386 in Case no. 17-3283].

de Ahorro y Credito de Juana Diaz (Claim No. 45705), filed by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 4522 in Case no. 17-3283];

- c. Response to Debtor's Objection to Claims (Number(s): 45705) Re: [4522](#) Debtor's Individual Objection to Claims *Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito de Juana Diaz (Claim No. 45705)* filed on February 25, 2019 by COOPERATIVA DE AHORRO Y CREDITO DE JUANA DIAZ. [Docket 5221 in Case no. 17-3283];
- d. *Cooperativa de Ahorro y de Juana Diaz* filed an Amended Proof of Claim and is identified at Prime Clerk Register Claim Number 168178;
- e. Debtor's Reply to Objection to Claims Re: [4522](#) Debtor's Individual Objection to Claims Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito de Juana Diaz (Claim No. 45705) filed on March 6, 2019 by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 5386 in Case no. 17-3283].

Regarding Cooperativa de Ahorro y Credito del Valenciano

- a. *Cooperativa de Ahorro y Credito del Valenciano* filed Proof of Claim Number 34165 filed on May 25, 2018;
- b. Debtor's Individual Objection to Claims *Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito del Valenciano (Claim No. 34165)* filed by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 4519 in Case no. 17-3283];

c. Response to Debtor's Objection to Claims (Number(s): 34165)

Re: [4519](#) Debtor's Individual Objection to Claims *Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito del Valenciano (Claim No. 34165)* filed on February 26, 2019 COOPERATIVA DE AHORRO Y CREDITO DEL VALENCIANO. [Docket 5241 in Case no. 17-3283];

d. *Cooperativa de Ahorro y Credito del Valenciano* filed an Amended Proof of Claim and is identified at Prime Clerk Register Claim Number 168195;

e. Debtor's Reply to Objection to Claims Re: [4519](#) Debtor's Individual Objection to Claims Notice of Hearing for Objection of Puerto Rico Sales Tax Financing Corporation to Proof of Claim of Cooperativa de Ahorro y Credito del Valenciano (Claim No. 34165) filed on March 6, 2019 by PUERTO RICO SALES TAX FINANCING CORPORATION. [Docket 5387 in Case no. 17-3283].

2. The "Credits Unions" reserves the right to respond, as necessary, to any statements made at the Hearing or otherwise by any party in connection with the above captioned Title III case.

3. The "Credits Unions" stand ready to answer any questions from the Court regarding our *Motion For Reconsideration Of Order Confirming The Third Amended Plan Of Adjustment Of Puerto Rico Sales Tax Financing Corporation* [Docket 604 in Case no. 17-3284] and Debtor's opposition [Docket 5242 in Case no. 17-3283] which are under submission to this Honorable Court. We also reserve the right to respond, as necessary, to any statements made at the Hearing with respect to any other agenda item.

WHEREFORE, the Credit Unions respectfully request this Honorable Court take notice of its compliance with the Scheduling Order.

CERTIFICATE OF SERVICE

WE hereby certify that, on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 8th day of March of 2019.

Lugo Mender Group, LLC

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Dated: March 8, 2019
San Juan, Puerto Rico